

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

FEDERATED LIFE INSURANCE  
COMPANY,

Plaintiff,

VS.

DAMON JOANIS; and ELIZABETH PABEN, as Personal Representative for the Estate of Elenya Herring,

## Defendants

No. 2:23-cv-01726 RSM

**STIPULATION AND ORDER TO  
BRIEFLY EXTEND DEADLINE FOR  
DEFENDANT DAMON JOANIS TO  
ANSWER THE COMPLAINT AND TO  
EXTEND OTHER PRELIMINARY  
CASE DEADLINES**

**NOTE ON MOTION CALENDAR:  
MARCH 6, 2024**

Pursuant to Western District of Washington Local Civil Rule 10(g), the parties, through their undersigned attorneys, stipulate and move as follows:

## I. STIPULATION

The parties hereby stipulate and agree to extend the time for Defendant Joanis to file his Answer to Federated Complaint to March 18, 2024.

In addition, this Court recently granted a brief extension of the deadlines for Initial Disclosures and filing of the Joint Status Report and Discovery Plan. The deadline for Initial Disclosures is now March 18—the same day that Joanis' Answer would be due if this stipulated motion is granted.

Joanis has informed Federated Life Insurance Company (“Federated”) that he intends to include counter-claims against Federated with his Answer. In order to allow Federated sufficient time to review the anticipated crossclaims and prepare its Initial Disclosures accordingly, the parties

1 agree to the deadline of April 1, 2024, for exchanging Initial Disclosures, and the deadline of April  
2 8, 2024, for the parties to file the Joint Status Report and Discovery Plan.

3 DATED this 6th day of March 2024.

4 LETHER LAW GROUP

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19 Attorney for Elizabeth Paben as Personal  
Representative for the Estate of Elenya Herring

1 ORDER  
2  
3

IT IS SO ORDERED.

DATED this 7<sup>th</sup> day of March, 2024.



RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE

Presented by:

LETHER LAW GROUP

/s/ Kevin J. Kay

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*Attorney for Elizabeth Paben as Personal Representative for the Estate of Elenya Herring*

## CERTIFICATE OF SERVICE

The undersigned hereby certifies under the penalty of perjury under the laws of the United States of America that on this date I caused to be served in the manner noted below a true and correct copy of the foregoing on the parties mentioned below as indicated:

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**By:**  **First Class Mail**  **ECF/Email**  **Legal Messenger**

Dated this 6th day of March 2024 at Seattle, Washington.

/s/ Devon Sheehan  
Devon Sheehan | Paralegal

**STIPULATION AND ORDER  
BRIEFLY EXTENDING DEADLINES – 4  
2:23-cv-01726-MLP**

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